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14 UNITED STATES OF AMERICA,

15 Plaintiff,

16 v.

17 JONATHAN SOUVANNASANE,

18 Defendants.

19 CASE NO. 1:23-CR-00042-JLT-SKO
20 1:15-CR-00167-JLT-KSO
21
22 STIPULATION TO CONTINUE SENTENCING;
23 FINDINGS AND ORDER
24
25 DATE: April 29, 2024
26 COURT: Hon. Jennifer L. Thurston
27
28

STIPULATION

17 The government, by and through United States Attorney Phillip A. Talbert and Assistant United
18 States Attorney and Kimberly A. Sanchez, and the defendant Jonathan Souvannasane, by and through
19 his counsel of record, Yan Shrayberman, hereby stipulate as follows.

20 1. This matter is currently set for sentencing and disposition on April 29, 2024 in this Court.
21 2. By this stipulation, defendant now moves to continue the sentencing and disposition until
22 June 24, 2023.

23 3. The parties agree and stipulate, and request that the Court find the following:

24 a) Counsel for defendant desires additional time to consider and prepare a motion to
25 withdraw the defendant's guilty plea.¹ The defendant will file such motion before June
26 24, 2023.

27
28 ¹ The government will not oppose the motion.

b) Counsel for the defendant desires additional time to then discuss a different plea agreement with the government and to attempt to come to a resolution of the matter.

4. Counsel for defendant believes that failure to grant the above-requested continuance would deny him the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

5. The government does not object to the continuance.

IT IS SO STIPULATED.

Dated: April 23, 2024

PHILLIP A. TALBERT
United States Attorney

/s/ KIMBERLY SANCHEZ
KIMBERLY SANCHEZ
Assistant United States Attorney

Dated: April 23, 2024

/s/ YAN SHRAYBERMAN
YAN SHRAYBERMAN
Counsel for Defendant
Jonathan Souvannasane

FINDINGS AND ORDER

IT IS SO FOUND.

IT IS SO ORDERED.

Dated: April 23, 2024

Jennifer L. Thurston
UNITED STATES DISTRICT JUDGE